

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

JAN 24 2019

Southern District of Texas

United States District Court

David J. Bradley, Clerk

United States of America)

v.)

Karla Vasquez Alvarado)

YOB: 1991)

COC: United States)

Case No. 11-19-0164-MDefendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 23, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

31 U.S.C. § 5332(a)(2)

Knowingly and intentionally attempted to evade the currency reporting requirement, under Title 31 USC 5316, by concealing more than \$10,000.00 in currency or other monetary instruments to wit; \$71,700.00 in the defendant's backpack and purse, and attempting to transport such currency or monetary instruments from a place within the United States, to wit; McAllen, Texas, to a place outside the United States, to wit; Monterrey, Mexico.

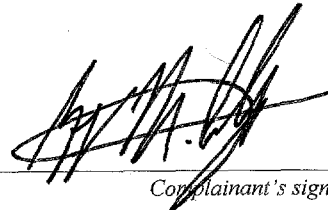
This criminal complaint is based on these facts:

On January 23, 2019, Karla Vasquez Alvarado was detained attempting to enter Mexico from the United States through the Hidalgo Port of Entry. ALVARADO was attempting to smuggle approximately \$71,700 of undeclared currency.

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

Approved AUSA Laura Garcia

J-G

Complainant's signature

Gregory Connolly HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/24/20198:30 am

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter E. Ormsby

Printed name and title

ATTACHMENT A

On January 23, 2019, at approximately 5:45pm, United States Customs and Border Protection Officer (CBPO) R. Contreras was conducting outbound inspections as part of his duties at the Hidalgo Port of Entry (POE). CBPO Contreras selected a "Palmas Taxi" (Dodge Grand Caravan SXT, TX LP#: KXF7044) for outbound inspection. The "Palmas Taxi" was occupied by the driver, Jonathan Ponce (DOB: 10/15/1963) and a passenger, Karla Vasquez ALVARADO (DOB: 03/11/1991, hereinafter known as ALVARADO), a lawful permanent resident of the United States.

CBPO Contreras interviewed ALVARADO and asked where she was coming from. ALVARADO stated she was coming from her house in McAllen, TX and was headed to visit her grandmother in Mexico. CBPO Contreras noticed ALVARADO seemed to be uncomfortable during the stop. Contreras asked ALVARADO for identification and was handed a Lawful Permanent Resident card. CBPO Contreras noticed ALVARADO was shaking and nervous while handing over the card. Contreras obtained a negative binding declaration for currency or monetary instruments in excess of \$10,000.00, weapons, and ammunition from ALVARADO. Once the negative declaration was obtained for all items, Contreras referred the vehicle to outbound secondary.

In secondary, a Supervisory Customs and Border Protection Officer (SCBPO) again obtained a negative declaration from ALVARADO. ALVARADO was instructed to unload all her belongings. CBPO Contreras inspected a green backpack in ALVARADO's possession and found large bundles of currency.

CBPO Reyna arrived and took the currency to a Glory Money Counter, UW-600. The total amount of USD removed from the green backpack was \$70,020. Once ALVARADO's purse was searched, \$1,680.00 USD was also found, making the total undeclared US currency, \$71,700.00.

Homeland Security Investigations (HSI) Special Agents (SA) were advised of the situation and responded to the Hidalgo POE to interview ALVARADO. HSI SA Connolly read ALVARADO her Miranda rights as witnessed by a CBPO C. Salinas. ALVARADO stated she would like to call her attorney, at which time all questioning was stopped, and the interview was concluded at 8:53pm.

At approximately 9:30pm, while processing ALVARADO's paperwork, ALVARADO stated to SA Connolly, in the presence of CBPO Salinas and Task Force Officer (TFO) C. Villarreal, that she did want to speak to them. ALVARADO was re-read her Miranda rights and it was documented on audio recording and a Statement of Rights form.

ALVARDO waived her rights both verbally and in writing at approximately 9:41pm. During the interview of ALVARADO, she admitted to agents she was transporting money south into Mexico, and the money was from illegal drug sales. ALVARADO admitted to SA Connolly, CBPO Salinas and TFO Villarreal she knew it was illegal to transport large amounts of money from the United States into Mexico undeclared.